



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St., Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

November 1, 2007

Mr. Lesley W. Thompson, Forest Supervisor
Lewis and Clark National Forest
1101 15th Street North,
P.O. Box 869
Great Falls, MT 59403-0869

Re: CEQ 20070413; Little Belt, Castle, and North Half
Crazy Mountains Travel Management Plan Final
EIS & ROD

Dear Mr. Thompson:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and the Record of Decision (ROD) for the Little Belt, Castle, and North Half Crazy Mountains Travel Management Plan Rocky Mountain Ranger District Travel Management Plan.

The EPA understands the complexities and challenges associated with developing a Travel Management Plan that balances motorized and non-motorized public recreation, while providing for land management and protection of aquatic and terrestrial resources and ecosystems. We recognize that there are many user groups and interests, and social, economic and environmental effects and trade-offs that need to be considered and balanced during decision-making. We appreciate the efforts of the Lewis & Clark National Forest in evaluating and considering many factors and viewpoints in its effort to make travel management decisions that balance the many trade-offs in the various geographic areas.

We are pleased that you have selected Alternative 5 with modifications for summer recreational travel, and Alternative 2 with modifications for winter recreation. We are also pleased with the statement in the ROD that uses will not be allowed to expand where water quality or secure wildlife habitat is threatened by uses, and that efforts will be made to improve compliance with the Travel Plan (e.g., emphasizing contacts with users on the ground, increased enforcement training, increased enforcement staffing on weekends and holidays, etc.). We are concerned, however, that funding for effective enforcement of travel restrictions has often been inadequate to allow appropriate compliance, and thus, protection of water quality, fisheries, wildlife, and other resources.

We believe it is important that motorized activities be properly managed and controlled so that they occur in a manner and location that is consistent with protection of the environment and other resources in order to sustain and protect the environment, other resources, and ecosystems for use by future generations. We are concerned that the demand for recreation opportunities, particularly motorized recreation, may be exceeding the capability of the land and resources to provide them in a manner that is consistent with resource and ecosystem protection.

We are pleased that several trails that are delivering unacceptable levels of sediment to streams or impacting westslope cutthroat trout habitat will be closed or reconstructed or repaired to eliminate sediment delivery to surface waters; and several roads and trails unnecessary for public use or contributing to resource degradation would be eliminated. We are concerned, however, that all roads/trails delivering excess sediment to surface waters will not be repaired and/or closed. Roads are often a primary source of human-caused sediment increases, and sediment yields are generally higher from roads than from trails, and from motorized trails than from non-motorized trails.

We want to emphasize the importance of adequate funding to implement needed road maintenance, road BMP improvements, and road decommissioning. The FEIS indicates that only approximately 5.2% of the roads in the project area have received any maintenance in the last six years. We are concerned that limited funding for road and trail maintenance and road decommissioning, which is already inadequate to address the significant road maintenance backlog, is being reduced further. We believe road networks should be limited to those that can be adequately maintained within agency budgets and capabilities, and if adequate funding is not available to properly maintain roads, the roads should be closed and/or decommissioned.

We note that some streams in the analysis area are water quality impaired and listed on Montana's Clean Water Act Section 303(d) list (e.g., Belt Creek, Carpenter Creek, Dry Fork Belt Creek, Dry Wolf Creek, Galena Creek, Lone Tree Creek, Newlan Creek, Smith River, NF Smith River, NF Musselshell River, Sheep Creek, SF Judith River, Judith River). It is important that the Forest Service management be consistent with efforts to promote restoration of water quality in impaired streams.

We appreciate the opportunity to review this Travel Management Plan and environmental documents during the NEPA process. If you have any questions you may contact Mr. Steve Potts of my staff in Helena at (406) 447-5022 or in Missoula at (406) 329-3313, or via e-mail at potts.stephen@epa.gov.



Thank you for your consideration.

Sincerely,

John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Julia Johnson, EPA, 8EPR-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena